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July 16, 2019

**VIA EMAIL**

Honorable John J. McConnell, Jr.  
United States District Court  
One Exchange Terrace  
Providence, RI 02903

***Re: John Doe v. Brown University  
17-cv-191 JJM-LDA***

Dear Judge McConnell:

On behalf of Plaintiff, we are writing to request that the Court extend the Scheduling Order by 60 days to complete expert discovery. Plaintiff had to replace an expert due to a conflict. Plaintiff has effectively mitigated the issue and has retained a new expert, whose schedule prohibits full disclosures by July 29, 2019 as currently scheduled. We also request that the deadlines for expert depositions and dispositive motions also be extended by 60 days.

We have consulted with Steve Richard on behalf of Brown on Thursday, July 12, 2019, but they have yet to express a position on this request.

Plaintiff's counsel is available for a conference call at the Court's convenience, if requested.

Respectfully Submitted,

*/s/ Susan Kaplan*

cc: Steven M. Richard, Esq.  
Sonja L. Deyoe, Esq.